

LACHTMAN COHEN P.C.

MEMO ENDORSED

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March 17, 2022

VIA ECF

The Honorable Valerie Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: Contreras v. TVN Enterprises Inc; Case No. 1:21-cv-09689-VEC

Dear Judge Caproni:

This firm represents the Defendant in the above-entitled action. We respectfully request an adjournment of the Initial Pretrial Conference (“IPTC”) currently scheduled for March 25, 2022, at 10:00 a.m., as well as an extension of the deadline to submit a joint letter to the Court to eight days before the rescheduled IPTC. The reason for this request is that Defendant has requested that Plaintiff allow additional time for Defendant to consider a pending settlement offer and to respond to that offer. This is our first request for an extension. Plaintiff consents to the request. The parties have conferred and are available for an Initial Pretrial Conference on the following dates: April 22, and 29, and May 6, and 13.

Respectfully submitted,

LACHTMAN COHEN P.C.

/s/ Gregory A. Blue

Gregory A. Blue (GB-9569)

cc: All Counsel of Record (VIA ECF)

Application GRANTED in part. The initial pretrial conference scheduled for March 25, 2022 is ADJOURNED to **April 8, 2022 at 10:30 a.m.** The parties' joint submission is due by **March 31, 2022**. The parties should appear for the conference by dialing 888-363-4749, using the access code 3121171 and the security code 9689.

Defendants must answer or otherwise respond to Plaintiff's complaint by **April 8, 2022**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

3/17/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE